

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, *et al.*,

Defendants.

Civ. No. 1:16-cv-00563 (TSE/TCB)

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' DEPOSITION DESIGNATIONS

Plaintiffs, by counsel, hereby submit the following objections and counter-designations in response to Defendants' Rule 26(a)(3)(A)(ii) deposition designations (Dkt. No. 314-2).¹

Plaintiffs' counter-designations reflect deposition testimony which Plaintiffs may offer if Defendants' designated testimony is permitted to be offered at trial. Plaintiffs reserve the right to challenge Defendants' use of any designated deposition testimony at trial depending on its use, including but not limited to relevance and admissibility. Plaintiffs' specific counter-designations are not intended to waive Plaintiffs' right to counter testimony that Defendants designated or any other testimony.

Plaintiffs reserve the right to object to any designated deposition testimony that is made irrelevant or is excluded by the Court's rulings on the forthcoming Motions in Limine or any evidentiary or substantive ruling at trial.

¹ Plaintiffs will submit their objections to Defendants' proposed exhibit list on or before December 23, 2020, pursuant to Dkt. No. 316.

In addition, Plaintiffs object to Defendant presenting affirmative deposition testimony (for any purpose other than impeachment) from any witness who appears live at trial, which includes each Plaintiff. Witnesses should appear only once at trial, whether live or by deposition.

Plaintiffs' specific objections to Defendants' Opening Deposition Testimony

Designations are as follows:

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
Witness: Jose Dagoberto Reyes				
16:12	17:17		401, 403	Irrelevant; more prejudicial than probative
18:5	18:14		401, 403	Irrelevant; more prejudicial than probative
18:18	18:20		401, 403	Irrelevant; more prejudicial than probative
19:5	19:21		401, 403	Irrelevant; more prejudicial than probative
20:3	20:19		401, 403	Irrelevant; more prejudicial than probative
21:17	21:19		403	Cumulative; more prejudicial than probative
22:7	22:22		403	Cumulative; more prejudicial than probative
23:1	23:2		403	Cumulative, more prejudicial than probative
26:15	26:17	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
26:20	26:20	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
26:22	27:9	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
27:12	27:12	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
27:14	27:16	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
27:19	27:19	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
28:6	28:8	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
28:13	28:13	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
28:15	28:17	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
28:20	28:20	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
28:22	29:2	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
29:5	29:5	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
29:13	29:15	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
29:16	29:18	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
29:20	29:20	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
29:22	30:2	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
30:13	30:13	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
30:15	30:16	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
30:19	30:19	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
30:21	31:1	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
31:3	31:3	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
31:14	31:17	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
32:6	32:16	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
32:20	33:2	26:15-33:2 (clarity and completeness)	403	Irrelevant; cumulative; more prejudicial than probative
33:6	34:21	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
37:17	39:5	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
39:8	39:15	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
39:18	41:14	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
41:17	42:7	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
42:10	43:9	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
43:13	44:3	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
44:6	44:6	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
44:10	45:14	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
45:17	45:21	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
46:2	46:16	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
46:18	47:16	33:6-48:7 (clarity and completeness)	611, 701	Mischaracterization of testimony; omits objections in transcript
72:22	73:2	72:22-77:5 (clarity and completeness)	602	Lack of foundation; omits objections in transcript
73:5	73:7	72:22-77:5 (clarity and completeness)	602	Lack of foundation; omits objections in transcript
74:13	74:18	72:22-77:5 (clarity and completeness)	602	Lack of foundation; omits objections in transcript
74:21	74:21	72:22-77:5 (clarity and completeness)	602	Lack of foundation; omits objections in transcript
Witness: Felix Alexis Bolanos				
23:10	23:12		401, 403	Irrelevant; more prejudicial than probative
24:1	24:2		401, 403	Irrelevant; more prejudicial than probative
24:4	24:5		401, 403	Irrelevant; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
29:12	29:15	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
30:6	30:8	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
30:10	30:13	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
31:14	32:3	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
32:6	32:20	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
33:8	33:10	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
33:12	33:12	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
34:8	34:10	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
34:12	34:12	29:6-35:13 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
36:16	36:18		401, 403	Irrelevant; more prejudicial than probative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
36:20	36:20		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
36:21	37:1		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
38:1	38:8	38:1-39:4 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
38:10	38:10	38:1-39:4 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
40:9	40:10	40:9-43:21 (clarity and completeness)		
40:13	40:21	40:9-43:21 (clarity and completeness)		
42:11	42:13	40:9-43:21 (clarity and completeness)		
42:15	42:17	40:9-43:21 (clarity and completeness)		
42:19	42:19	40:9-43:21 (clarity and completeness)		
42:20	42:22	40:9-43:21 (clarity and completeness)		
43:1	43:7	40:9-43:21 (clarity and completeness)		
44:13	44:22			
45:1	46:1			
46:5	47:16			
47:18	47:19			
47:21	48:6			
48:9	48:16			

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
50:14	50:17			Not testimony
51:10	52:3	48:9-52:11 (clarity and completeness)	403	More prejudicial than probative
52:5	52:11	48:9-52:11 (clarity and completeness)	403	More prejudicial than probative
53:13	54:4			
54:6	54:22			
55:1	55:4			
55:7	56:4	48:9-52:11; 57:6-13 (clarity and completeness)	403	More prejudicial than probative
56:6	56:19	48:9-52:11; 57:6-13 (clarity and completeness)	403	More prejudicial than probative
56:21	57:5	48:9-52:11; 57:6-13 (clarity and completeness)	403	More prejudicial than probative
70:6	71:12		401, 403	Irrelevant; more prejudicial than probative
Witness: Esteban Ruben Moya Yrapura				
15:16	15:22		401; 403	Cumulative; more prejudicial than probative
16:1	16:22		401, 403	Cumulative; more prejudicial than probative
17:1	17:14		401, 403	Cumulative; more prejudicial than probative
18:3	18:5		401, 403	Cumulative; more prejudicial than probative
18:9	18:16		401, 403	Cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
18:22	19:5		401, 403	Cumulative; more prejudicial than probative
19:11	19:14		401, 403	Cumulative; more prejudicial than probative
19:16	19:16		401, 403	Cumulative; more prejudicial than probative
22:8	22:9	22:8-23:17 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
23:13	23:17	22:8-23:17 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
23:19	23:19	22:8-23:17 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
23:21	24:1	22:8-23:17 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
24:3	24:3	22:8-23:17 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
24:5	24:7	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
24:9	24:9	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
24:19	24:22	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
25:2	25:7	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
25:9	25:14	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
25:21	25:22	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
26:1	26:10	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
26:12	28:15	24:5-28:15 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; lack of foundation
28:19	29:8	35:4-37:11 (clarity and completeness)		
29:10	30:3	35:4-37:11 (clarity and completeness)		
30:5	31:8	35:4-37:11 (clarity and completeness)		
31:12	32:9	35:4-37:11 (clarity and completeness)		
32:12	33:8	35:4-37:11 (clarity and completeness)		
34:22	35:3	35:4-37:11 (clarity and completeness)		
37:15	39:2		611, 403	Argumentative; misstates testimony; cumulative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
39:4	39:11		611, 403	Argumentative; misstates testimony; cumulative
39:13	40:4		611, 403	Argumentative; misstates testimony; cumulative
40:7	42:9		611, 403	Argumentative; misstates testimony; cumulative
42:11	42:15		611, 403	Argumentative; misstates testimony; cumulative
42:17	42:22		611, 403	Argumentative; misstates testimony; cumulative
43:2	43:14		611, 403	Argumentative; misstates testimony; cumulative
43:18	44:11		611, 403	Argumentative; misstates testimony; cumulative
44:14	45:4		611, 403	Argumentative; misstates testimony; cumulative
45:6	45:12		611, 403	Argumentative; misstates testimony; cumulative
47:18	47:20	45:16-47:22 (clarity and completeness)	611, 403	Misstates testimony; cumulative
47:22	47:22	45:16-47:22 (clarity and completeness)	611, 403	Misstates testimony; cumulative
48:20	49:11		403	Cumulative; more prejudicial than probative
49:14	49:18		403	Cumulative; more prejudicial than probative
49:20	51:20		403	Cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
52:1	52:12		403	Cumulative; more prejudicial than probative
52:14	53:14		403	Cumulative; more prejudicial than probative
55:7	55:8	53:20-55:19 (clarity and completeness)	403	Cumulative; more prejudicial than probative
55:10	55:10	53:20-55:19 (clarity and completeness)	403	Cumulative; more prejudicial than probative
63:13	63:15	63:16-20; 67:4-67:7 (clarity and completeness)		
Witness: Herbert David Saravia Cruz				
12:15	12:18		609, 403	Conviction evidence inadmissible in certain circumstances; more prejudicial than probative
19:8	19:11		401, 403	Cumulative; more prejudicial than probative; lack of foundation
20:13	20:15		401, 403	Cumulative; more prejudicial than probative; lack of foundation
21:14	21:21		401, 403	Cumulative; more prejudicial than probative; lack of foundation
22:2	22:4		401, 403	Cumulative; more prejudicial than probative; lack of foundation
22:7	22:9		401, 403	Cumulative; more prejudicial than probative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
22:12	22:14		401, 403	Cumulative; more prejudicial than probative; lack of foundation
22:17	22:17		401, 403	Cumulative; more prejudicial than probative; lack of foundation
24:2	24:7		401, 403	Irrelevant; cumulative; more prejudicial than probative
24:11	25:1		401, 403	Irrelevant; cumulative; more prejudicial than probative
26:10	26:17		401, 403	Irrelevant; more prejudicial than probative
35:18	35:20		401, 403	
41:8	42:15		401, 403	More prejudicial than probative; lack of foundation
42:18	42:20		401, 403	More prejudicial than probative; lack of foundation
42:22	43:19		401, 403	More prejudicial than probative; lack of foundation
44:15	46:4		401, 403	Lack of foundation
46:7	46:7		401, 403	Lack of foundation
46:10	47:8		403	Cumulative; more prejudicial than probative
47:11	48:6		403	Cumulative; more prejudicial than probative
49:19	50:13		403	Cumulative; more prejudicial than probative
50:20	52:9		403	Cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
52:12	54:1		401, 403	Cumulative; more prejudicial than probative; lack of foundation
54:4	54:4		401, 403	Cumulative; more prejudicial than probative; lack of foundation
54:7	55:9		403	Cumulative; more prejudicial than probative
68:8	69:18		401, 403	Cumulative; more prejudicial than probative
78:4	78:10		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
78:18	78:19		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
78:22	78:22		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
79:1	79:3		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
79:6	79:9		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
79:12	79:15		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
79:18	79:21		401, 403	Irrelevant; more prejudicial than probative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
80:2	80:5		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
80:8	80:11		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
80:14	80:14		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
83:22	84:1		401, 403	Irrelevant; more prejudicial than probative; lack of foundation
84:4	84:9		401, 403	
Witness: Rosy Giron de Reyes				
12:20	13:2		401, 403	Irrelevant; more prejudicial than probative
19:18	19:22		403	Cumulative; more prejudicial than probative
20:1	21:6		403	Cumulative; more prejudicial than probative
21:11	21:22		403	Cumulative; more prejudicial than probative
24:19	24:21	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
25:1	25:1	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
25:10	25:12	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
25:15	25:15	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
28:7	28:13	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
28:15	28:16	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
28:18	28:20	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
28:22	28:22	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
30:6	30:8	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
30:10	30:10	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
30:12	30:14	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
30:16	30:16	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
30:18	30:20	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
30:22	30:22	25:17-26:10 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
31:7	31:15	31:16-32:2 (clarity and completeness)		
32:22	33:3		403	Cumulative
34:22	35:10		403	Cumulative
35:16	35:21		403	Cumulative
36:7	36:10			
55:22	58:9		401, 403	More prejudicial than probative; lack of foundation
62:19	63:14			
63:18	63:21			
84:18	85:13		401, 403	More prejudicial than probative; lack of foundation
85:14	85:18		401, 403	More prejudicial than probative; lack of foundation
86:5	86:11		401, 403	More prejudicial than probative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
86:12	86:21		401, 403	More prejudicial than probative; lack of foundation
87:19	87:21		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
88:1	88:4		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
88:6	88:12		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
88:17	88:17		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
88:19	88:21		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
89:3	89:12		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
89:14	89:18		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
89:21	90:1		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
90:4	90:11		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
90:15	90:20		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
91:3	91:3		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
91:5	91:8		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
102:4	102:6		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
102:8	102:8		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
102:10	102:14		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
102:16	102:16		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
102:18	102:20		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
Witness: Ruth Rivas				
23:17	24:5	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
25:21	26:4	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
26:6	26:7	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
26:11	26:14	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
26:16	26:16	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
26:19	26:19	24:6-25:20 (clarity and completeness)	401, 403	Irrelevant; more prejudicial than probative
27:19	28:2		401, 403	Cumulative; more prejudicial than probative
28:11	28:14		401, 403	Cumulative; more prejudicial than probative
29:10	29:12		401, 403	Cumulative; more prejudicial than probative
30:14	30:15		401, 403	Cumulative; more prejudicial than probative
30:17	30:18		401, 403	Cumulative; more prejudicial than probative
33:18	33:20		401, 403	Cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
34:1	34:4		401, 403	Cumulative; more prejudicial than probative
35:6	35:10		401, 403	Cumulative; more prejudicial than probative
35:12	35:13		401, 403	Cumulative; more prejudicial than probative
35:15	35:16		401, 403	Cumulative; more prejudicial than probative
36:1	36:3		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
36:5	36:6		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
37:20	37:21		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
38:1	38:5		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
38:7	38:11		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
38:13	38:16		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
38:18	38:22		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
39:1	39:16		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
39:18	39:18		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
40:15	40:17		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
40:19	41:1		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
41:3	41:3		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
54:15	54:20	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3 (clarity and completeness)		
55:13	55:16			
56:3	56:6			
62:12	62:14	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
64:22	65:2	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)	401	Lack of foundation
65:4	65:7	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)	401	Lack of foundation
66:20	67:1			
68:16	69:6	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		
69:19	69:21	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		
70:7	70:8	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		
70:11	70:19	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		
70:20	70:21	53:19-54:14; 57:1-4; 58:3-11; 58:16-60:3, 61:22-63:2 (clarity and completeness)		

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
71:2	71:18		401	Lack of foundation
71:20	71:22		401	Lack of foundation
73:18	74:8			
74:11	74:20			
79:14	79:15			
79:18	80:4			
87:12	87:14		401	Lack of foundation
87:17	87:17		401	Lack of foundation
88:3	88:15		401	Lack of foundation
88:17	89:15		401	Lack of foundation
135:8	135:10			
135:14	135:16			
Witness: Yovana Jaldin Solis				
14:5	14:7		401, 403	Irrelevant; more prejudicial than probative
14:21	15:1			
16:18	16:19		403	Cumulative; more prejudicial than probative
16:21	16:21		403	Cumulative; more prejudicial than probative
17:1	17:3		403	Cumulative; more prejudicial than probative
17:13	17:20		403	Cumulative; more prejudicial than probative
17:21	18:4		403	Cumulative; more prejudicial than probative
22:5	22:7		401	Lack of foundation
22:9	22:9		401	Lack of foundation
22:19	22:20		401	Lack of foundation
23:1	23:1		401	Lack of foundation
23:3	23:7		401	Lack of foundation
23:9	23:13		401	Lack of foundation
23:16	23:20		401	Lack of foundation
41:8	41:10		401	Lack of foundation
41:12	41:12		401	Lack of foundation
41:14	41:17		401	Lack of foundation

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
41:19	41:20		401	Lack of foundation
63:15	63:18	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
63:20	63:20	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
63:22	64:5	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
64:7	64:7	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
64:9	64:14	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
64:16	64:16	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
64:18	65:3	60:4-62:9 (context and completeness)	403	More prejudicial than probative; argumentative; misstates prior testimony and requirements for legal filings
66:4	66:6		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony
66:9	66:9		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony
66:11	66:13		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony
66:15	66:15		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony
66:17	66:19		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
66:21	66:21		401, 403	Irrelevant; more prejudicial than probative; lack of foundation; cumulative; misstates prior testimony
76:5	76:10			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
76:13	76:14			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
76:16	76:20			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
77:5	77:9			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
77:11	77:11			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
77:13	77:14			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
77:16	77:16			Irrelevant; more prejudicial than probative; lack of foundation; cumulative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
77:18	77:21			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
78:1	78:1			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
78:10	78:14			Irrelevant; more prejudicial than probative; lack of foundation; cumulative
78:16	78:16		401, 403	Irrelevant; more prejudicial than probative; cumulative
79:3	79:12		401, 403	Irrelevant; more prejudicial than probative; cumulative
95:17	95:21		401, 403	Irrelevant; more prejudicial than probative; cumulative
96:2	96:2		401, 403	Irrelevant; more prejudicial than probative; cumulative
Witness: Rosa Elena Amaya				
18:4	18:10		401, 403	Irrelevant; more prejudicial than probative
22:2	22:5		403	Cumulative; more prejudicial than probative
22:20	22:22		403	Cumulative; more prejudicial than probative

Defendants' Designation Start	Defendants' Designation End	Plaintiffs' Counter-Designations	Plaintiffs' FRE Objections	Plaintiffs' Other Objections
24:2	24:10		403	Cumulative; more prejudicial than probative
33:19	33:21		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
34:2	34:4		401, 403	Irrelevant; more prejudicial than probative; cumulative; lack of foundation
52:15	52:17	51:12-20 (clarity and completeness)		
54:10	54:13			
54:18	54:20			
64:19	65:9		401, 403	More prejudicial than probative; lack of foundation
65:14	66:1		401, 403	More prejudicial than probative; lack of foundation
67:15	67:18			
85:5	85:7		403	More prejudicial than probative; cumulative
108:14	108:18			Irrelevant; more prejudicial than probative; cumulative; lack of foundation
108:21	108:22			Irrelevant; more prejudicial than probative; cumulative; lack of foundation
114:12	114:18		401, 403	More prejudicial than probative; cumulative

Respectfully submitted,

Date: December 18, 2020

//s//

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Certificate of Service

I hereby certify that on this 18th day of December, 2020, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
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